

# **EXHIBIT 231**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**DECLARATION OF DONNA PRICE IN SUPPORT BRIEF ON STANDING**

I, DONNA PRICE, declare, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Donna Price. I am an elector of the State of Georgia and a resident of DeKalb County. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

2. I hereby incorporate my previous declarations as filed in this case as if fully restated verbatim herein.

3. I am currently registered to vote in DeKalb County, Georgia.

4. I first cast a ballot in a Georgia election in 1992. I believe that I have voted in every presidential election since 1992. I have also voted in midterm

elections and primaries. I have voted both on the Georgia GEMS Diebold/Premiere/ES&S paperless electronic voting system and on paper absentee ballots.

5. Voting is as important to me as life itself. The importance of this individual right to me, as well as fighting to preserve, protect, and defend it, is built into my DNA. Following my concerns about the security of Georgia's paperless electronic voting system, I founded Georgians for Verified Voting (GAVV) in 2003. Since that time, I have worked tirelessly to educate myself and the public about voting systems and vulnerabilities and to promote verifiable, secure, and transparent elections for Georgia voters. The need for this is evident: voting is a personal and individual right inherent to the United States and guaranteed by the Constitution. It is the reason my and others' ancestors came to and established this country. My right and ability to exercise my individual right to vote and to have that vote counted is sacrosanct to me.

6. I have served as a national leader representing Georgia in the elections integrity effort as I described in my previous declarations. I have worked with leaders, experts, and policy makers, collaborating across disciplines to ensure that voting is accessible, anonymous, reliable and secure and that elections are transparent, accurate and verifiable. This work, and my involvement in this case is

about more than a single election, election outcome, or political party. I have worked with legislators and members of the Republican, Democratic and Tea Parties and members of the Green, Independent, and Constitution parties.

7. Because my vote matters, I have spent years suffering from the disenfranchisement inherent in the DRE system and the current BMD system which demand I trust without verifying that all those known and unknown from behind a wall of secrecy accurately count the votes I intended when using those nontransparent technologies to mark and cast my ballots.

8. I plan to vote on an absentee paper ballot in future elections for which I am eligible or if offered the option, hand-marked paper ballots at my polling place, so that I have no doubt that the original voting instrument, the paper ballot I hand marked, is a transparently voter-verified, software-independent record of my votes. Unfortunately, voting by absentee paper ballot imposes other burdens on me as a voter and even potential disenfranchisement entirely. It also means I am forced to forgo the privilege, honor, and right to vote alongside my fellow voters at my polling on Election Day. Voting absentee is a poor substitute for voting in person on Election Day and my preference would be to vote in person if I were permitted to cast a voter-verifiable vote in a transparent, anonymous, secure, and reliable election system at my polling place on Election Day.

9. In my work on this issue, I have gained considerable knowledge about Georgia's voting system and processes and how those compare to the voting systems of other states and recommendations of top national election integrity, security and technology experts. As detailed in my previous declarations, I am aware of and concerned with threats to the security, transparency, and verifiability of Georgia elections posed by implementation of the BMD-based election system by Dominion Voting Systems, Inc. as selected by the Georgia Secretary of State's office (the "Election System"). The Election System calls for all in-person voting to be conducted on in-precinct scanners/tabulators that read summary paper records generated by electronic ballot-marking devices ("BMDs") from which votes are tabulated using an unverifiable, non-human-readable Quick-Response ("QR") code.

10. Georgia voters, including myself, are expected to trust that our votes are secure and counted in the face of numerous threats and vulnerabilities in our system because of the lack of transparency and verifiability of the system. I cannot read a QR code, and so I cannot verify upon marking a ballot using the BMD that the barcode on the summarized paper ballot it produces accurately represents the votes I intended to cast. Accordingly, without a durable, software-independent, voter-verified record to review, I can't know that my personal, individual vote counted as intended or that the results of a given election conducted using the

Election System will be accurate and reliable and reflect the expression of my own unique voice as a voter.

11. As it stands as of the time of this declaration, for elections that occurred in 2020 and for future elections that use this Election System, I am forced to choose between two options: either vote on a system where my votes are recorded on the paper ballot as a QR code that is not transparent and not verifiable at the time cast, or I am denied the freedom to vote with other electors in my polling location, have to deal with the stresses, concerns and burdens of additional bureaucratic hoops of voting by absentee paper ballots, but will be able to verify my choices on that ballot when I complete it.

12. For the Presidential Preference Primary in 2020, the General Election in 2020, and the Run-Off in January 2021, I requested absentee paper ballots because of my concern over the lack of transparency and verifiability when using the Election System. For the Presidential Preference Primary, I requested my absentee ballot on January 27, 2020. The ballot was issued on February 4, 2020 and received on February 21, 2020, with the original election date on March 24, 2020. Later the Secretary of State's Office sent another ballot to my home without my requesting it. I thought it was in error so I destroyed that ballot. The election was twice rescheduled by the state to May 19 and June 9, 2020 where the final slate of

candidates may not have matched those on the ballot I had cast in February. Because of the changed dates for the election, I didn't know if the ballot I mailed in February would be counted. I contacted Dekalb County and explained my concerns and was told to email another completed application form, which I immediately did, but I never received that ballot and the election came and went without knowing if my February ballot was counted or discounted, or if I had lost the opportunity that other voters had to select from a roster of additional candidates.

13. The burdens to voting by absentee paper ballot are like navigating a minefield: the requirements to request and obtain ballots, needing working printing devices, questions about the status of mail service and/or ballot drop boxes, missing notice of or opportunity to vote if there are changes to the rosters of candidates, concerns that the signature on the ballot won't match the signature on record, which would trigger a need to have the signature cured coupled with not having the opportunity for in-person proof of identity rather than having an equal opportunity with other electors for in-person identity confirmation at my local polling location, checking the GA MyVoterPage multiple times to confirm ballot requests were received, when ballots were mailed by the state, that voted ballots were received or not and accepted or not. There has also been an increasingly negative connotation attached to voting by absentee ballot, as if when I exercise my right and duty as a

citizen to vote using a method that allows me to transparently verify my selections on the ballot are what I intend, that I am voting in an illegitimate manner. For example, Secretary of State Raffensperger was quoted in a December 23, 2020 article in the *Atlanta Journal-Constitution* about absentee voting: “It makes no sense when we have three weeks of in-person early voting available. It opens the door to potential illegal voting.”<sup>1</sup>

14. Were the Court to order that Georgia cannot implement and use the Election System, but must instead use hand-marked paper ballots for all voters who can hand mark, I would perceive substantially less risk in casting my ballot in-person because that step in the voting process would be transparent and verifiable and would conform to the principles and practices outlined by top election integrity, security and computing experts; and I trust their knowledge because it is based on research, experience and science.

[signature on following page]

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<sup>1</sup> <https://www.ajc.com/politics/georgia-elections-chief-seeks-to-end-no-excuse-absentee-voting/UJAKYKRPLBBALHWTSF7UAJZCNU/>



I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 12th day of February, 2021 in Atlanta, Georgia.

DocuSigned by:  
*Donna Price*  
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DONNA PRICE